

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

MICHAEL GRAHAM; ALEXUS DIGGS; and  
HEATHER CONNOLLY, *on behalf of  
themselves and all others similarly situated,*

*Plaintiffs-Petitioners,*

v.

ALLEGHENY COUNTY; and ORLANDO  
HARPER, *Warden of Allegheny County Jail,*

*Defendants-Respondents.*

Civil Action No. 2:20-cv-00496

**ELECTRONICALLY FILED**

**IMMEDIATE RELIEF SOUGHT**

**JOINT MOTION FOR ENTRY OF CONSENT ORDER**

The parties respectfully request that this Honorable Court enter the parties' Proposed Consent Order, attached as Exhibit 1, and as support therefor aver as follows:

1. Plaintiffs filed a motion for preliminary injunction on April 9, 2020, asking this Court to, *inter alia*, require that Defendants instituting policies and reasonable accommodations, consistent with the CDC's public health guidelines to protect people incarcerated at the Allegheny County Jail from COVID-19.
2. After numerous discussions, the parties have reached an agreement on the policies and reasonable accommodations that the Allegheny County Jail will follow to protect people from COVID-19.
3. Accordingly, the parties are jointly submitting a proposed consent order that, if approved by the Court, will resolve the plaintiffs' motion for preliminary injunction.

WHEREFORE, the parties respectfully request that this Court enter the Proposed Consent Order attached as Exhibit 1.

Respectfully submitted,

/s/ Sara J. Rose

Sara J. Rose, Esq.

PA ID No.: 204936

/s/ Witold J. Walczak

Witold J. Walczak, Esq.

PA ID No.: 62976

**American Civil Liberties Union of Pennsylvania**

PO Box 23058

Pittsburgh, PA 15222

T: (412) 681-7864 (tel.)

F: (412) 681-8707

srose@aclupa.org

vwalczak@aclupa.org

/s/ Alexandra Morgan-Kurtz

Alexandra Morgan-Kurtz, Esq.

PA ID No. 312631

**Pennsylvania Institutional Law Project**

100 Fifth Ave, Ste. 900

Pittsburgh, Pa 15222

T: (412) 434-6175

amorgan-kurtz@pailp.org

/s/ Sozi Pedro Tulante

Sozi Pedro Tulante, Esq.

PA ID No. 202579

**Dechert LLP**

Cira Centre

2929 Arch Street

Philadelphia, PA 19104-2808

T: (215) 994-2496

F: (215) 665-2496

[Sozi.tulante@dechert.com](mailto:Sozi.tulante@dechert.com)

*Admitted pro hac vice*

*Attorneys for Petitioners/Plaintiffs*

/s/ John A. Bacharach

John A. Bacharach, PA ID 19665

Allegheny County Assistant Solicitor

Allegheny County Law Department

/s/ Bret Grote

Bret D. Grote, Esq.

PA ID No. 317273

/s/ Quinn Cozzens

Quinn Cozzens, Esq.

PA ID No. 323353

/s/ Jaclyn Kurin

Jaclyn Kurin, Esq.

D.C. Bar ID No. 1600719

/s/ Jules Lobel,

Jules Lobel, Esq.

Of Counsel

N.Y. Bar No. 1262732

/s/ Swain Uber

Swain Uber, Esq.

Of Counsel

PA I.D. No. 323477

**Abolitionist Law Center**

P.O. Box 8654

Pittsburgh, PA 15221

T: (412) 654-9070

bretgrote@abolitionistlawcenter.org

qcozzens@alcenter.org

300 Fort Pitt Commons Building  
445 Fort Pitt Boulevard Pittsburgh, PA 15219  
Tel: (412) 350-1150  
[john.bacharach@AlleghenyCounty.us](mailto:john.bacharach@AlleghenyCounty.us)

*Counsel for Defendants*